

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MELISSA ARZU, Individually and as the
Administrator of the Estate of KEVIN ISMAEL
GREENIDGE, Deceased and MELISSA ARZU
Individually,

Plaintiffs,

-against-

AMERICAN AIRLINES, INC.,

Defendant.

Case No. 1:23-cv-02116

**DECLARATION OF
JEREMY A. HELLMAN**

Jeremy A. Hellman, pursuant to 28 U.S.C. § 1746, deposes and declares that the following is true under penalties of perjury:

1. I am a member of the law firm of Rheingold, Giuffra, Ruffo & Plotkin LLP, counsel for Plaintiffs in the within action. I am fully familiar with all the pleadings and proceedings heretofore had herein.

2. Attached hereto are true and accurate copies of the following documents:

Exhibit 1: Complaint in the instant matter

Exhibit 2: Order of May 25, 2023 allowing for jurisdictional discovery while defendant's motion to dismiss was pending.

Exhibit 3: Plaintiffs' First Document Demands To Defendant American Airlines, Inc. Regarding Jurisdictional Defenses served on May 25, 2023

Exhibit 4: Defendant American Airlines, Inc.'s Response To Plaintiffs' First Document Demands Regarding Jurisdictional Defenses served on June 26, 2023

Exhibit 5: Defendant's July 19, 2023 email explaining their discovery response.

Exhibit 6: Order of July 14, 2023, whereby defendant stipulated for purposes of this motion, "that American Airlines has extensive business contacts, including significant

physical infrastructure and thousands of employees, in New York”

Exhibit 7: Proposed Amended Complaint

Dated: July 28, 2023
New York, NY



By: Jeremy A. Hellman

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I certify that a true copy of the above document was
served upon each attorney of record by ECF on July
28, 2023

/s/ Jeremy A. Hellman